

EXHIBIT 2

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING**

CRISANTO MEDINA, a married man; and FIRS HOME
OWNERS ASSOCIATION, a domestic nonprofit
corporation,

Petitioners,

vs.

CITY OF SEATAC, a Washington municipal corporation;
and FIFE MOTEL INC., a domestic corporation, *et al.*,

Respondents.

CASE NO. 17-2-07094-7 KNT
NOTICE OF COURT DATE (Judges)
(NOTICE FOR HEARING)
KENT REGIONAL JUSTICE CENTER ONLY
(Clerk's Action Required) (NTHG)

TO: THE CLERK OF THE COURT and to all other parties per list on Page 2:

PLEASE TAKE NOTICE that an issue of law in this case will be heard on the date below and the Clerk is directed to note this issue on the calendar checked below.

Calendar Date: February 1, 2021

Day of Week: Monday

Nature of Motion: Motion for Entry of An Order Finding Compliance with the Court's Order

CASES ASSIGNED TO INDIVIDUAL JUDGES - RJC

If oral argument on the motion is allowed (LCR 7(b)(2)), contact staff of assigned judge to schedule date and time before filing this notice. **Working Papers:** The judge's name, date and time of hearing must be noted in the upper right corner of the Judge's copy. **Deliver Judge's copies to Judges' Mailroom at RJC**

☒ Without oral argument (Mon - Fri)

☐ With oral argument Hearing

Date/Time: Monday, February 1, 2021 at 9:00 AM

Judge's Name: The Honorable LeRoy McCullough

Trial Date: _____

CHIEF CIVIL DEPARTMENT - RJC

All Chief Civil calendars are at 10:00 on Fridays, except as noted. See signs posted at RJC for calendar location. Deliver working copies to Judges' Mailroom, Room 2D at RJC. In upper right corner of papers write "Chief Civil Department" and date of hearing.

☐ Extraordinary Writs (Show Cause Hearing) (LCR 98.40)

☐ Supplemental Proceedings /Judicial Subpoenas (9:15 am) (LCR 69)

☐ Motions to Consolidate with multiple judges assigned (LCR 40(a)(4)) (without oral argument) M-F

☐ Structured Settlements (9:00 am Fridays) (LCR 40(2)(S))

Non-Assigned Cases:

☐ Dispositive Motions (10:30 am)

☐ Non-Dispositive Motions M-F (without oral argument)

☐ Motions for Revision (LCR 7(b)(8))

☐ Certificates of Rehabilitation- Weapon Possession (Convictions from Limited Jurisdiction Courts) (LCR 40(a)(2)(B))

PARTIES: The address of the Regional Justice Center is 401 4th Avenue North, Kent, WA 98032. You must bring this document and appear as scheduled.

☐ Room

☐ See Posted Signs

You may list an address that is not your residential address where you agree to accept legal documents.

Signature: /s/ Mark S. Johnsen

Print/Type Name: Mark S. Johnsen

WSBA #28194 _____ (if attorney)

Attorneys for: Respondent City of SeaTac

Address: 4800 South 188th Street

City, State, Zip: SeaTac, WA 98188-8605

Telephone: (206) 973-4840

Email Address: mjohnsen@seatac.gov

Date: 1/21/2021

NOTICE OF COURT DATE - KENT REGIONAL JUSTICE CENTER ONLY

JudgesKNT10/10/14

www.kingcounty.gov/courts/scforms

Page 1

LIST NAMES AND SERVICE ADDRESSES FOR ALL NECESSARY PARTIES REQUIRING NOTICE

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Name: Walter H. Olsen, Jr.
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 Telephone No.: (253) 200-2288
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Name: _____
 Service Address: _____
 City, State, Zip: _____
 WSBA # _____
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 WSBA # _____
 Attorneys for: _____
 Telephone No.: _____
 Email Address: _____

IMPORTANT NOTICE REGARDING CASES

Party requesting hearing must file motion & affidavits separately along with this notice. List the names, addresses and telephone numbers of all parties requiring notice (including GAL) on this page. Serve a copy of this notice, with motion documents, on all parties.

The original must be filed at the Clerk's Office not less than **six** court days prior to requested hearing date, except for Summary Judgment Motions (to be filed with Clerk 28 days in advance).

THIS IS ONLY A PARTIAL SUMMARY OF THE LOCAL RULES AND ALL PARTIES ARE ADVISED TO CONSULT WITH AN ATTORNEY.

The REGIONAL JUSTICE CENTER is in Kent, Washington at 401 Fourth Avenue North. The Clerk's Office is on the second floor, Room 2C. The Judges' Mailroom is Room 2D.

DO NOT USE THIS FORM FOR FAMILY LAW OR EX PARTE MOTIONS

The Honorable LeRoy McCullough
Courtroom 4A, Dept. 32
Hearing Date: Monday, February 1, 2021
Without Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

CRISANTO MEDINA, a married man; and
FIRS HOME OWNERS ASSOCIATION, a
domestic nonprofit corporation,

Petitioners,

v.

CITY OF SEATAC, a Washington municipal
corporation; and FIFE MOTEL INC., a
domestic corporation, *et al.*,

Respondents.

Cause No. 17-2-07094-7 KNT

**MOTION FOR ENTRY OF AN ORDER
FINDING COMPLIANCE WITH THE
COURT'S SEPTEMBER 19, 2018 ORDER
TO REMAND FOR MODIFICATION**

MOTION

Petitioners Crisanto Medina and Firs Homeowners Association, and Respondents City of SeaTac and Fife Motel, Inc. (collectively the "Parties") jointly move this Court to find that the Parties have complied with the Court's September 19, 2018 Order to Remand for Modification¹ ("Order to Remand") dated September 19, 2018 (Dkt. No. 118, pp.7-9). Additionally, the Parties request that the Court enter a final Order referring the Relocation Plan and Appendix² back to the Parties for

¹ The full title of the pleading is Findings of Fact, Conclusions of Law, and Order to Remand for Modification.

² Although the Appendix is dated May 29, 2019, it was signed by the Parties in January, 2020.

**MOTION FOR ORDER FINDING COMPLIANCE
WITH THE COURT'S ORDER TO REMAND FOR
MODIFICATION - 1**

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

1 implementation. This Motion is based upon the files and records herein and the following
2 Stipulation.

3 **STIPULATION**

4 The Parties, by and through their attorneys of record, hereby stipulate to the following:

5 1. In accordance with the Order to Remand a copy of the Relocation Plan and its
6 Appendix was approved by the City of SeaTac Community and Economic Development Director
7 on January 24, 2020. A copy of the Relocation Plan and Appendix are attached as Exhibits A & B
8 respectively. A copy of the City's Certificate of Approval is attached as Exhibit C.

9 2. The approved Relocation Plan and Appendix was submitted to the City of SeaTac
10 Hearing Examiner for review, and the Examiner upheld the City of SeaTac Community and
11 Economic Development Director's approval of the Firs Mobile Home Park Relocation Plan and
12 Appendix. A copy of the Hearing Examiner's Decision dated January 29, 2020 is attached as
13 Exhibit D.

14 3. After the Hearing Examiner upheld the approval of the Relocation Plan and
15 Appendix, the Order to Remand required that a copy of the Plan and Appendix be filed with the
16 Court for review and a determination of whether the Parties complied with the Order.

17 4. The issues in the Land Use Appeal that have been raised pursuant to the Land Use
18 Petition Act, Chapter 36.70C RCW, have been resolved. Therefore, the Parties do not request that
19 the Court continue to retain jurisdiction of this matter.

20 ///

21 ///

22 ///

23 **MOTION FOR ORDER FINDING COMPLIANCE**
24 **WITH THE COURT'S ORDER TO REMAND FOR**
MODIFICATION - 2

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

5. The Parties request this Court enter a final Order in the form attached hereto as Exhibit E, finding compliance with the September 19, 2018 Order to Remand, upholding the Hearing Examiner's January 29, 2020 decision, and referring the Relocation Plan and Appendix back to the Parties for implementation.

DATED this 13th day of February, 2020.

/s/ Mark S. Johnsen
Mark S. Johnsen, WSBA #28194
Mary Mirante Bartolo, WSBA #20546
City of SeaTac
Counsel for Respondent, City of SeaTac

/s/ Walter H. Olsen
Walter H. Olsen, WSBA #24462
Olsen Law Firm, PLLC
Counsel for Respondent, Fife Motel, Inc.

/s/ Christina Latta Henry
Christina L Henry, WSBA# 31273
Henry & Degraaff, PS
Counsel for Petitioner Crisanto Medina

/s/ Vincente Omar Barraza
Vicente Omar Barraza, WSBA #43589
BARRAZA LAW, PLLC
Counsel for Petitioner Firs Homeowners Association

**MOTION FOR ORDER FINDING COMPLIANCE
WITH THE COURT'S ORDER TO REMAND FOR
MODIFICATION - 3**
Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington, I caused the original of the foregoing document to be electronically filed with the King County Superior Court, which also served an electronic copies of the foregoing to the following attorneys of record:

Vicente Omar Barraza, WSBA #43589
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Telephone: (206) 933-7861
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Attorneys for Petitioners

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Olsen Law Firm, PLLC
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Telephone: (253) 200-2288
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Attorneys for Respondent Fife Motel Inc.

Christina L. Henry, WSBA#3127
Henry & DeGraaff, PS
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Telephone: (206) 330-0595
Email: chenry@hdm-legal.com
Attorneys for Petitioners

Copies were also delivered to the following parties of record via U.S. Postal Service, first class mail, postage pre-paid:

Janice I. Sylvester
12605 115th Avenue Court E.
Puyallup, WA 98374-3183

Earl Gipson
17050 51st Avenue S.
SeaTac, WA 98188-3246

DATED this 21st day of February, 2021.

s/ Ellaine M. Wi
Ellaine M. Wi, Legal Analyst
City of SeaTac, Legal Department
4800 S. 188th Street
SeaTac, WA 98188-8605

**MOTION FOR ORDER FINDING COMPLIANCE
WITH THE COURT'S ORDER TO REMAND FOR
MODIFICATION - 4**
Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

The Honorable LeRoy McCullough
Courtroom 4A, Dept. 32
Hearing Date: Monday, February 1, 2021
Without Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

CRISANTO MEDINA, a married man; and
FIRS HOME OWNERS ASSOCIATION, a
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CITY OF SEATAC, a Washington municipal
corporation; and FIFE MOTEL INC., a
domestic corporation, *et al.*,

Respondents.

Cause No. 17-2-07094-7 KNT

**[PROPOSED] ORDER FINDING
COMPLIANCE WITH THE COURT'S
SEPTEMBER 19, 2018 ORDER TO
REMAND FOR MODIFICATION**

ORDER

This matter came before the Court on January 21, 2021 on a Joint Motion to Find Compliance with the Court's September 19, 2018 Order to Remand for Modification.

The Court having considered the pleadings filed in this action, including the Stipulation of the Parties Related to Compliance with the Court's September 19, 2018 Order to Remand for Modification, a copy of the Relocation Plan and its Appendix, the City's Certificate of Approval dated January 24, 2020, and the Decision of the Hearing Examiner dated January 29, 2020, the Court finds:

**ORDER FINDING COMPLIANCE WITH THE
COURT'S ORDER TO REMAND FOR
MODIFICATION - I**

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

1. The Parties have complied with this Court's Order dated September 19, 2018.

2. All issues related to this appeal have been resolved, including matters related to the collection of rents and the Mobile Home Park closure date, and therefore this LUPA action has been concluded.

Based upon the above findings, **IT IS SO ORDERED:**

1. The Hearing Examiner's decision upholding the City of SeaTac Community and Economic Development Director's approval of the Firs Mobile Home Park Relocation Plan and Appendix dated January 24, 2020 is **AFFIRMED**.

2. The Relocation Plan and Appendix is referred back to the Parties for implementation and the Court's jurisdiction over the issues in the Land Use Appeal that were raised pursuant to the Land Use Petition Act, Chapter 36.70C RCW, and the appeal concerning those issues has concluded.

DATED and ENTERED this _____ day of January, 2021.

HONORABLE LEROY MCCULLOUGH
Superior Court Judge

Agreed and approved as to form:

/s/ Mark S. Johnsen
Mark S. Johnsen, WSBA #28194
Mary Mirante Bartolo, WSBA #20546
City of SeaTac
Counsel for Respondent, City of SeaTac

/s/ Walter H. Olsen
Walter H. Olsen, WSBA #24462
Olsen Law Firm, PLLC
Counsel for Respondent, Fife Motel, Inc.

**ORDER FINDING COMPLIANCE WITH THE
COURT'S ORDER TO REMAND FOR
MODIFICATION - 2**
Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

Exhibit A

EXHIBIT A

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
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RELOCATION REPORT AND PLAN (RRP)
SeaTac Municipal Code Section 15.464.600

Firs Mobile Home Park
20440 International Blvd, SeaTac, WA. 98198

Prepared on behalf of the owners of the Firs Mobile Home Park by:
Kerry Lynch, Relocation Specialist
Submitted to SeaTac Department of Planning: May 27, 2016
Revised: October 7, 2016
Approved: October 17, 2016

Firs Mobile Home Park
20440 International Blvd, SeaTac, WA 98198
RELOCATION REPORT AND PLAN

Introduction:

This relocation report and plan for the Firs Mobile Home Park is being prepared pursuant to the requirements of the SeaTac Municipal Code, Sections 15.464.600, related to the permanent closure and change of land use of mobile home parks.

The owners of the Firs Mobile Home Park intend to comply fully, as the plan that follows will indicate, with the SeaTac Municipal Code requirements as well as provisions of Washington State Law (Chapters 59.20 and 59.21 RCW) as administered by the Washington State Office of Manufactured Housing.

Recognizing the potential for resident disruption and stress in the event of a forced closure, the Firs Mobile Home Park representatives will provide significant relocation assistance as possible, including, but not limited, to the following:

1. Designation of an experienced Relocation Specialist
2. Individual meetings with each resident household to identify preferred areas to relocate, school, bus and shopping access. Assistance with the filing of state paperwork and availability of a 24-hour hotline, 206-550-8167 for residents.
3. Assessments of all homes with respect to condition, movability, asbestos testing and abatement (in the event of demolitions) and other relevant factors.
4. Identification of residents with special needs (seniors, disabled, health issues, limited English-speaking). Residents will be provided with assistance including senior housing information, housing locations with nearby health facilities and transportation access. An interpreter will be available on-site when needed.
5. Identification of mobile home and RV parks in the area and available spaces. Lists will be provided twice a month and weekly closer to the park closure date. Resident access to computer on-site to view available housing. A phone log will be kept of contacts with mobile home park owners/managers looking for park openings. Assistance with contacting the managers and securing applications and lease information. (Attachment A -- List of Mobile Home Parks in the area.)
6. Identification of apartments, senior housing, low-income and affordable housing and other housing opportunities in the area for all residents on a biweekly basis. Assistance with paperwork to secure housing and transportation will be provided, as needed. (Attachment B -- Affordable and Low-Income Housing Lists)
7. Provision of special tenant assistance which will include up-fronting the cost of relocation of each home or the cost of demolition of each home. In addition, relocation assistance of \$2,000 will be provided to each mobile household within 3

- weeks of their move-out to assist with relocation costs. Residents residing in recreational vehicles will be provided their last month's space rent at no cost.
8. Publication of monthly resident information bulletins and newsletters (Attachment C - Notice of Open House with Residents).

Relocation Report and Plan Elements

1. Home/Income Information Sheets -- the sheets were filled out with residents at the Open House and in subsequent individual meetings. (Attachment D)
2. Actions to be taken to assist each of the 66 residents in the park to relocate:
 - a. Residents who are expected to qualify for state assistance from the Office of Manufactured Housing, Relocation Assistance Fund:

There are 37 households residing in single-wide homes. These residents are eligible for up to \$7,500 in assistance with either the move or demolition of their homes.

There are 21 households residing in homes that have either tip-outs or have additional living spaces in their homes. Some of the tip-outs are from the manufacturer, other have been added and in many cases have rendered the homes not moveable. The state considers these additions in the same category of a doublewide home that is eligible for up to \$12,000 in relocation or demolition costs.

There are 4 residents who reside in doublewide homes that are eligible for up to \$12,000 for relocating or demolishing their home.

The owners of the park will provide for an assessment of each home for movability. Many of the homes because of age (pre-HUD, 1976) and condition may not be movable and will have to be demolished.

- b. Households that don't qualify for state assistance:

The Washington State Attorney General has determined that the following homes do not qualify for state assistance: travel trailers, recreational vehicles, buses or park models and stick homes. There are 4 households living in homes that are not eligible for state assistance.

For these households, the owners of the park have agreed to provide the following assistance: Identifying parks that will take travel trailers, 5th wheels and RV's and assisting with rental applications and paperwork. The owners will also NOT be charged their last month's rent so they can use the additional money for their new location.

c. Mobile Home Owners that Don't Qualify for State Assistance:

The state will determine if any homeowners are not eligible for assistance because of income that exceeds the state guidelines. If a resident, however, is not eligible for state assistance, the owners will still provide the moving assistance of \$2,000 and the home will be demolished with the park owners paying for the costs.

d. Assistance with State Paperwork:

The Relocation Specialist and her staff will assist residents who qualify for state assistance with filling out paperwork and submitting it to the state. This paperwork includes a 2-page application, a W-2 form and an Assignment Form. The resident is also required to submit proof of income for any adults residing in the household and a copy of the title to the home (Attachment B – Washington State Office of Manufactured Housing Relocation Information/Applications). The paperwork can be submitted directly by the homeowner or provided to the Relocation Specialist to submit. The state will not accept applications until after the official 12-month notice of park closure has been issued.

The state OMH will review each application then send a written notice of qualification to each homeowner. The state fund currently has money to provide reimbursements soon after the paid moving or demolition invoices are received. The owners of the Firs have agreed to advance these relocation and demolition costs and will have each resident complete an Assignment Form so the owner will be reimbursed directly by the state.

The state provides relocation assistance for either the move of a mobile home to another park or site or the asbestos testing, abatement and demolition of a home. The relocation assistance from the state is considered "non-taxable" income. The assistance from the owners of the park is considered by the Internal Revenue Service (IRS) to be taxable income so the residents will provide a copy of the W-9 with a new address to the Relocation Specialist for the park owners to provide a year-end 1099 form.

State funding is available to the homeowner when either a paid invoice for the move or demolition of the home is submitted by the Relocation Specialist to the State Office of Manufactured Housing. The invoice must indicate that it has already been paid and is being submitted for reimbursement.

The owners of the park will pay the invoice after the invoice has been approved by the homeowner and submitted to the Relocation Specialist. The homeowner

then signs an Assignment Form to be submitted to the state that provides for the reimbursement of the upfront costs to be sent directly to the park owner. If there is still money left in the amount allotted for either the move or demolition of the home, it is available to the homeowner based upon receipts provided to the state that document the expenditures.

Relocation expenses that are available for reimbursement directly to the homeowner include the purchase of a mobile home built in 1976 (HUD-certified home) or newer. Funds can't be used for the purchase of a "stick" home.

Other qualifying expenses include gas purchases while looking for a new location, housing while a home is being set-up, storage units, costs of actual move i.e. moving boxes, moving help, truck etc. Additional expenses are "non-refundable deposits but do not include rent. Also costs of security and credit checks and hooking-up utilities. Receipts are submitted directly to the Office of Manufactured Housing and the reimbursement check is paid directly to the homeowner. The Relocation Specialist will assist residents with all the paperwork required by the state (Attachment F - List of Expenses Reimbursed by the Washington State Office of Manufactured Housing).

e. Assistance With Housing Paperwork and Site Visits:

Assistance is also available with filling out and submitting apartment and low-income and affordable housing paperwork. The paperwork is available in the relocation office. A social worker is part of the relocation team and has already met with a number of residents and is available to assist through-out the relocation process. Assistance also includes identifying openings in mobile home parks, apartments and houses, making telephone contacts on behalf of the residents with the apartment and mobile home park managers and helping, when needed, with transportation to the housing sites. Apartment openings will be posted on all doors of interested residents and can be emailed as well. Lists will also be posted on the door of the relocation office, located in the park. Postings will also include openings in mobile home parks, mobile homes for sale and affordable housing options.

f. Hotline Available to Residents:

A 24-hour hotline is available to all residents. The hotline number is 206-550-8167. The Relocation Specialist and the interpreter will be checking messages daily as well. An interpreter for the Spanish-speaking residents will assist with ongoing communications. Calls are usually not only received from residents, but also from park owners with openings, realtors and rental agencies.

Following the issuance of the formal notice of closure to residents, the Relocation Specialist and her staff will be on-site on a weekly basis for meetings with residents. Hours will be posted on the office door and near the mailboxes. Residents are encouraged to make an appointment if they need an interpreter. Office hours will include days and evenings.

3. Information Updates Delivered to Residents:

Monthly Information Updates will be delivered to each household and also posted on the relocation office in the park. When a resident isn't home, the notices will be taped to the front door. The updates always include the hotline and city, state and movers contact information. When the official 12-month notice of park closure is provided to all residents, it will be sent by registered mail and also hand-delivered to all residents. The Relocation Specialist will document the delivery of the 12-month notice and provide the proof of delivery information to the City of SeaTac, Department of Planning. Monthly relocation reports will also be provided to the City.

4. Movers/Demolition Companies Identified:

The Relocation Specialist has worked with a number of movers and demolition companies over the past 20 years. She has identified movers, asbestos-testing and abatement companies and a demolition company. She has their license information on file and has provided the information to the Washington State Office of Manufactured Housing (Attachment G—Mobile Home Move or Demolition Vendor Information). She will review bids and schedules, approve invoices with the homeowner, arrange for payments to the vendors and send the invoices to the state for reimbursement. Each moving situation is unique and will be handled individually with each resident.

It usually takes about seven to ten days to move and set-up a mobile home after all the permitting is in place. Sometimes getting a final occupancy permit takes even more time depending on the schedule of the various inspectors (ie. electrical, tie-downs, set-up, etc.). Labor Ready and Just Like Daughters moving services are also available for those residents with special needs to assist with downsizing, packing and moving and help finding short-term housing. These costs are reimbursable by the Washington State Office of Manufactured Housing. Residents will also be provided with non-profit companies who will come by and pick-up surplus items.

5. Initial Residents Meetings

All 66 residents in the park were hand-delivered a notice on Monday, May 9, notice of an all-day Open House adjacent to the park with the Relocation Specialist and her team including an interpreter. Residents had an opportunity to ask questions about the process for the closing of the park and learn about the relocation assistance that will be provided.

including financial tenant assistance from both the owner and the Washington State Office of Manufactured Housing.

At the Open House, residents filled out individual information sheets and signed up for individual meeting. The park owners are designating an office on-site for relocation meetings and office hours and the hotline will be posted on the door. A sign-up sheet was provided to get contact information for each resident. The Relocation Specialist provided business cards to each resident with her contact information including e-mail and hotline.

In follow-up meetings, an interpreter was available for non-English speaking residents. There are 49 residents who speak Spanish and limited English. The Relocation Specialist and her staff, including Sandra Mears, an experienced social worker, met individually with residents and completed a relocation information sheet for each homeowner. Several meetings were held in resident's homes with those who were unable to attend the Open House. A number of residents have called the hotline to ask questions and to clarify information.

The relocation team was able to complete confidential relocation information sheets with many of the mobile home residents at the Open House and in follow-up meetings. A number of residents took the Information Sheets and said they would call the hotline to have them picked up. Near the conclusion of the Open House most of the residents from the Firs returned for a group meeting and to ask additional questions. Additional Information Sheets were handed out at this meeting and the sign-up sheets were available. At the close of the meeting, several residents encouraged their neighbors to not fill out the forms or sign any paperwork until they had an opportunity to seek legal counsel. As a result, no additional Information Sheets have been submitted and some of the residents didn't add their names to the sign-up sheets.

A meeting was held on June 11, 2016 with the residents of the Firs and officials from the City of Seatac overseeing the relocation process. Residents were notified of the meeting by a letter from the park owner placed on their doors and reminder notices posted throughout the park. The meeting was held in a hotel adjacent to the park. A sign-up sheet was provided and the meeting was well-attended. The relocation specialist, a social worker and a Spanish interpreter were also available to provide information and respond to questions.

When the Relocation Report and Plan is approved it will be hand-delivered to all residents of the park. It will also be made available in the park in the Manager's/Relocation Offices located on-site.

The Relocation Specialist has a notebook filled with relocation resources that include lists of affordable and low-income housing and applications; mobile home parks with openings; mobile homes for sale; apartment openings; RV openings; senior, veterans and special needs resources and bus routes. Other resources include packing and moving

organizations, non-profits for donations of items, Spanish resources available, applying for housing information; landlord and tenant's rights and responsibilities. Most of these resources are also provided in Spanish. In individual meetings with residents we have identified the special needs of several residents of the park.

At the open house and in the individual meetings, residents indicated the areas they would be willing to relocate. Several residents were interested in purchasing homes in other parks. Phone calls have been made to parks in the areas identified and a list of park openings, homes for sale and support services available will be provided to all residents on a weekly basis. Extra copies will also be available in a folder on the relocation office door.

6. Park Closure Timeline:

The park will close within 12-months of the service of an official closure notice. The official closure notice will take place after approval of the Relocation Report and Plan. Residents can file paperwork with the state any time after they receive the 12-month closure notice. The paperwork must be submitted prior to their move and the submission of moving/demolition invoices. It usually takes the state 2 weeks to review an application and qualify a household for relocation assistance and to send the approval letter. If there is any missing paperwork, the state will also send a letter requesting additional information. The state program is funded at the rate of \$100 from each sale of a mobile home. During the spring and summer there are more sales of homes so monies come into the fund at a faster rate than during the winter months. A number of parks are closing in the state but currently the state has the funding to provide immediate reimbursements.

7. Relocation Assistance Schedule

The Relocation Specialist expects to be spending approximately 10 – 14 hours a week working with residents on relocations. A number of residents in the park work during the day so hours will also include evenings and weekends. The President of Alliance Pacific, Inc., Kerry Lynch, is serving as Relocation Specialist. She has over 20 years of successful experience working with relocating residents from mobile home parks and apartment complexes. She has worked closely with representatives from various cities and the State Office of Manufactured Housing on these relocations.

Ms. Lynch will be assisted by Sandra Mears, a skilled social worker with previous experience in mobile home relocations; Kaitlin Larson and Meghan Gaebe, housing specialists; and Alma Raymundo who has worked with the team as an interpreter in 4 other mobile home parks and 1 apartment complex. She has been assisting with communication with non-English speaking residents in the park. Approximately 15 – 18 hours a month will be spent helping residents identify park openings, senior and low income housing and affordable apartments and with special needs.

8. Additional Assistance to Residents

When needed, additional dumpsters will be provided on site for the use of residents in handling the additional debris created with downsizing, moving and tear-downs. Scheduling will be coordinated for homes that will require asbestos testing, abatement and demolition so it is the least disruptive to residents as possible. The demolition contractor will also be required to tape off the demolition site for safety purposes. All asbestos-testing, abatement and demolitions will be provided by licensed contractors within state and local guidelines.

9. List of all Parties Related to Closure of Firs Mobile Home Park (Attachment H – List of All Parties Related to Closure of the Firs MHP)

10. Relocation Specialist

Kerry Lynch, President
Alliance Pacifico, Inc.
810 W. Lincoln Blvd.
Spokane, WA 99224
206-550-8167
klynchapi@comcast.net

Ms. Lynch has personally coordinated the successful relocations of more than 1800 resident and resident households in mobile home parks and apartment complexes either in the process of closing, recently closed or renovated in King, Snohomish and Spokane Counties and the cities of Marysville, Seattle, Spokane, Renton, Lynnwood, Des Moines, Shoreline, SeaTac and Lynnwood, Washington.

Her responsibilities will be to serve as the owner's representative and coordinator for all relocation matters including those specified in this Relocation Report and Plan.

Resident's Personal Security – Ms. Lynch has confidential information provided by all residents in a notebook in her possession. A copy of this information is also in a locked file cabinet in her office located at 810 W. Lincoln Blvd, Spokane, WA 99224. At the end of 5 years, it will be shredded and destroyed. A copy of each homeowner's W-9 information is also provided to the park owner for an end of the year 1099 filing for the tenant assistance. This information will be kept in a locked file cabinet by the park owners along with resident leases and other documentation. When it is no longer needed, it will be shredded and destroyed.

Firs Mobile Home Park
20440 International Blvd, SeaTac, WA 98198
REPORTE Y PLAN DE REUBICACIÓN

Introducción

Este reporte y plan de reubicación para "Firs Mobile Home Park" está siendo preparado conforme los requisitos del código municipal de SeaTac, Sección 15.464.600, relacionado al cierre permanente y el cambio de terreno de las casas móviles.

Los dueños del "Firs Mobile Home Park" tienen la intención de cumplir plenamente, tal y como lo indica el plan a continuación, con los requisitos del Código Municipal de SeaTac y con los estatutos de las leyes del Estado de Washington (Capítulos 59.20 y 59.21 RCW) y administrado por la oficina de Viviendas Prefabricadas del Estado de Washington ("Washington State Office of Manufactured Housing").

Reconociendo los posibles inconvenientes y estrés que este tipo de eventos de clausura forzosa puede causar a los inquilinos, los representantes del "Firs Mobile Home Park" van a proporcionar asistencia de reubicación significativa, en la medida que les sea posible, incluyendo, pero no limitada, a lo siguiente:

1. Se asignará una especialista con experiencia en reubicación.
2. Reuniones individuales con cada inquilino para identificar qué áreas prefieren para mudarse, teniendo en cuenta: escuelas, acceso a transporte público y comercios. Asistencia para llenar los documentos del Estado y acceso para inquilinos a una línea telefónica de asistencia directa las 24 horas del día, (206) 550-8167.
3. Evaluación de todas las casas con respecto a sus condiciones, movilidad, prueba de asbestos y su disminución (en caso de demolición), y otros factores relevantes.
4. Identificación de las necesidades especiales de los inquilinos (personas mayores de edad, discapacitados, personas con problemas de salud, y/o manejo limitado del inglés). A los inquilinos se les proveerá asistencia, incluyendo información sobre viviendas para personas mayores, vivienda cercana a instituciones de salud y acceso a medios de transporte. Un intérprete estará disponible en las oficinas del "Firs Mobile Home Park" cuando sea necesario.
5. Identificación de terrenos con espacios disponibles para casa móviles y vehículos recreacionales (RVs) en el área. Se proveerán listados de lugares disponibles dos veces al mes y semanalmente según se vaya acercando la fecha del cierre. Los inquilinos tendrán acceso a una computadora en las oficinas de "Firs Mobile Home Park" para ayudarles en la búsqueda de viviendas disponibles. La oficina mantendrá un registro de llamadas de propietarios y administradores de terrenos que tengan espacios disponibles para casas móviles. Se proveerá asistencia para comunicarse con los administradores de terrenos en someter aplicaciones e información sobre contratos de arrendamiento (Apéndice A - Listas de espacios disponibles para casas móviles).
6. Se proveerá información dos veces a la semana sobre departamentos, vivienda para personas mayores y/o de bajo ingreso, viviendas económicamente accesibles, y oportunidades de otro tipo de viviendas en el área. Se proveerá asistencia con la preparación de los documentos de aplicación para vivienda y transporte según sea necesario (Apéndice B - Listas de Viviendas).
7. Se proveerá asistencia especial a los inquilinos que incluye el costo por adelantado de reubicación de cada casa móvil o el costo de demolición de estas. En adición

se proveerán \$2,000 de asistencia para la reubicación por cada casa móvil tres semanas antes de la fecha de mudanza para asistir con los costos de reubicación. Inquilinos viviendo en vehículos recreacionales (RVs) no se les cobrará el último mes de renta por su espacio en "Firs Mobile Home Park".

8. Se publicará mensualmente boletines de información y periódicos. (Apéndice C -- Aviso para visitar las viviendas disponibles ["Open Houses"]).

Reporte de Reubicación y Elementos del Plan

1. Formularios de información de vivienda e ingresos -- los inquilinos llenaron estos formularios durante la visita ["Open House"] y en reuniones individuales subsiguientes. (Apéndice D - Formularios de información de vivienda e ingresos)
2. Medidas que deben tomarse para ayudar a cada uno de los 66 inquilinos en el proceso de reubicación:

- 1 Inquilinos que esperan calificar para asistencia estatal a través del Fondo de Reubicación de la Oficina de Viviendas Prefabricadas (Office of Manufactured Housing, Relocation Assistance Fund)

Existen 37 familias viviendo en casas móviles de ancho sencillo ("single-wide"). Estos residentes son elegibles hasta \$7,500 en asistencia para transportar o demoler la misma.

Existen 21 familias viviendo en casas móviles con anexos externos ("tip-outs") o espacios de vivienda adicional. Algunos de los anexos son del fabricante, otros fueron agregados, y en muchos casos esto ya no permite que la casa sea transportada. El Estado considera estos anexos en la misma categoría que una casa móvil de ancho doble ("double-wide") y estas son elegibles hasta un máximo de \$12,000 en asistencia para transportar o demoler la misma.

Existen 4 familias viviendo en casas móviles de ancho doble ("double-wide"). Estos son elegibles hasta un máximo de \$12,000 en asistencia para transportar o demoler la misma.

Los dueños de "Firs Mobile Home Park" proporcionarán una evaluación de cada casa para determinar si pueden transportarse o no. Muchas casas por su antigüedad (diseñadas antes de 1976 o de la creación del Departamento de Vivienda Urbana [HUD, por sus siglas en inglés]) y por su condición probablemente no puedan ser transportadas, por lo que tendrán que ser demolidas.

B. Viviendas que no van a calificar para asistencia del Estado

El Fiscal General del Estado de Washington (Washington State Attorney General) ha determinado que las siguientes viviendas no son elegibles para asistencia estatal: tráilers para acampar, vehículos recreacionales (RVs), autobuses, vehículo recreacional tipo modelo campamento ("Park Model RV"), o casas improvisadas (no regidas por los códigos de construcción). Existen 4 familias que residen en viviendas que no son elegibles para asistencia estatal.

Para estas 4 familias, los dueños de "Firs Mobile Home Park" han acordado proveer lo siguiente: identificar lugares donde se permitan tráilers para acampar, remolques de

tipo 5ta llanta y vehículos recreacionales (RVs). También les ayudarán con las aplicaciones de renta y documentos relacionados. A los dueños de estos hogares NO se les cobrará el último mes de renta para que puedan usar el dinero en su reubicación.

C. Dueños de casas móviles que no califican para asistencia estatal

El Estado determinará si los dueños de las casas móviles no son elegibles para asistencia porque sus ingresos exceden las normas estatales. Sin embargo, si el inquilino no es elegible para asistencia estatal, los dueños van a proporcionar asistencia de \$2,000 para la reubicación y la casa será demolida y los dueños de "Firs Mobile Home Park" cubrirán los gastos de demolición.

D. Asistencia con documentos del Estado

La Especialista en Reubicación y su personal van a asistir a los inquilinos que califican para la asistencia estatal, llenando y enviando los documentos al Estado. Estos documentos incluyen una aplicación de dos páginas, la forma W-2, y una Forma de Asignación ("Assignment Form"). Se requiere que los inquilinos sometan verificación de ingresos de todos los adultos que vivan en la casa y copia del título de propiedad de la casa (Apéndice E - Oficina de Viviendas Prefabricadas del Estado de Washington, Información y Aplicación de Reubicación). Los inquilinos pueden enviar los documentos directamente o se lo pueden dar a la Especialista en Reubicación para que ella los envíe. El Estado no aceptará aplicaciones hasta que "Firs Mobile Home Park" no haya emitido el anuncio oficial de clausura que debe salir con 12 meses de anticipación.

La Oficina de Viviendas Prefabricadas del Estado de Washington verificará cada una de las aplicaciones y notificará por escrito su decisión de elegibilidad a cada dueño de casa. El fondo estatal actualmente tiene dinero para proporcionar reembolsos poco tiempo después de recibir la factura que indica que la casa fue transportada o demolida. Los dueños de "Firs Mobile Home Park" están de acuerdo en pagar por adelantado los costos de transportación y/o demolición de casas a cada inquilino elegible. Cada inquilino elegible deberá llenar la Forma de Asignación para que los dueños de "Firs Mobile Home Park" reciban su reembolso directamente del Estado.

El Estado proporcionará asistencia ya sea para la reubicación de la casa móvil para otro terreno, o para pruebas de asbestos, disminución de asbestos y demolición de la casa. La asistencia financiera del Estado es considerada como un ingreso "exento de impuestos." En cambio, la asistencia por parte de los dueños está considerada por el Internal Revenue Service (IRS) como una sujeta a impuestos, por lo tanto, los inquilinos tendrán que proporcionar a la Especialista en Reubicación con una Forma W-9 con su nueva dirección, para que los dueños les proporcionen un formulario 1099 al finalizar el año.

Los fondos de asistencia estatal estarán disponibles para los dueños de casas móviles cuando las facturas de transporte o demolición de la casa, ya pagada, sea enviada por la Especialista en Reubicación a la Oficina de Viviendas Prefabricadas del Estado de Washington. La factura debe de indicar que la misma ya fue pagada y está siendo enviada para su reembolso.

Los dueños de "Firs Mobile Home Park" pagarán la factura después de que la misma sea aprobada por los dueños de la casa y que haya sido entregada a la Especialista en Reubicación. Los dueños de la casa tendrán que firmar la Forma de Asignación para

que se le proporcione el reembolso directamente a los dueños de "Firs Mobile Home Park" por el pago anticipado de los costos. Una vez pagados estos gastos de transporte o demolición de la casa, si todavía queda dinero restante de la cantidad anteriormente asignada por el Estado, la misma estará disponible al inquilino basado en los recibos o facturas que se sometieron al Estado para documentar los gastos. Los gastos de reubicación que están disponibles para reembolso directamente a los dueños de casas, incluyen la compra de una casa móvil construida en 1976 (Casa Certificada por HUD) o más nueva. Los fondos no pueden ser usados para comprar una casa improvisada (no regida por los códigos de construcción). A éstas se les conoce como "stick homes" en inglés.

Otros gastos elegibles incluyen gastos de gasolina que se utilizó mientras buscaba una nueva localización, alojamiento mientras que se transporta y se completa la instalación de la casa móvil, almacén, costo de la mudanza, por ejemplo, comprar cajas, pagar por asistencia para cargar las cajas, y/o rentar camión para la mudanza. Gastos adicionales incluye el pago de depósitos no reembolsables, pero aquí no se incluye el pago de la renta mensual. También se incluyen los costos de verificación de crédito y antecedentes criminales, y/o el pago por conexión de utilidades. Los recibos deben ser enviados directamente a la Oficina de Viviendas Prefabricadas y el cheque de reembolso se pagará directamente al dueño de la casa. La Especialista en Reubicación le asistirá con todos los documentos que requiera el Estado (Apéndice F - Lista de gastos reembolsable por la Oficina de Viviendas Prefabricadas del Estado de Washington).

E. Ayuda con los documentos de vivienda y visitas

También habrá ayuda disponible para llenar y entregar los documentos para solicitar departamentos y viviendas a personas de bajo ingreso. Los documentos estarán disponibles en la Oficina de Reubicación. Un trabajador social es parte del equipo de reubicación y ya se reunió con algunos inquilinos y estará disponible para asistir durante el proceso de reubicación. La ayuda también incluye la identificación de departamentos, casas y de espacios disponibles en terrenos para casas móviles; hacer llamadas telefónicas a oficinas de departamentos o a la gerencia de terrenos para casas móviles, a nombre de los residentes; y ofrecer transportación para visitar dichas localidades. Listados de departamentos disponibles serán publicados en puertas de los inquilinos que estén interesados y también se les pueden enviar por correo electrónico si lo desean. Las listas también estarán publicadas en la Oficina de Reubicación localizada en el "Firs Mobile Home Park". Las listas también incluirán espacios disponibles en terrenos para casas móviles, casas móviles que están a la venta, y opciones de vivienda de bajo costo.

F. Línea de ayuda directa para inquilinos

El número de la línea de ayuda directa es el (206) 550-8167 y estará disponible para todos los inquilinos las 24 horas del día. La Especialista en Reubicación y la intérprete estarán revisando los mensajes de correo de voz diariamente. La intérprete para los residentes que hablan español asistirá con la comunicación de manera constante. Las llamadas recibidas no solo serán de los inquilinos afectados, pero también de los dueños de terrenos de casas móviles que tengan espacios disponibles, agentes de bienes raíces, y/o agencias que rentan departamentos.

Una vez se emita la notificación oficial a los inquilinos de la clausura de "Firs Mobile Home Park" la Especialista de Reubicación estará disponible en la oficina

semanalmente para reunirse con los inquilinos. Los horarios estarán publicados en las puertas de la oficina y en el área de los buzones de correos. Se recomienda a los inquilinos a hacer cita si necesitan de un intérprete. Los horarios incluirán horas de día y de noche.

3. Información actualizada será entregada a los inquilinos

Avisos mensuales con información actualizada serán entregadas en cada hogar y también estarán publicados en la oficina de reubicación en el "Firs Mobile Home Park". Cuando los inquilinos no se encuentren en su casa las notificaciones serán puestas con cinta adhesiva en la puerta. Estos avisos siempre incluyen la información contacto Especialista en Reubicación (línea directa), la ciudad, el Estado, y la información sobre compañías de mudanza. En cuando la notificación oficial del cierre de "Firs Mobile Home Park" que saldrá con 12 meses de anticipación sea proporcionada a los inquilinos, se enviará por correo certificado, y también será entregado personalmente a todos los inquilinos. La Especialista en Reubicación documentará las entregas de dicha notificación de 12 meses y le proporcionará pruebas de dicha entrega al Departamento de Planificación de la ciudad de SeaTac. Reportes mensuales con información sobre la reubicación también será entregada a la ciudad.

4. Compañías de Mudanza y Demolición Identificadas

La Especialista en Reubicación ha trabajado con un sinnúmero de compañías de mudanza y de demolición durante los últimos 20 años. Ella ya ha identificado las compañías de mudanza, pruebas de asbestos, disminución de asbestos y demolición. Ella tiene la información de licencias en su archivo y esta información fue proporcionada a la Oficina de Viviendas Prefabricadas del Estado de Washington (Apéndice G - Información de la compañía de mudanza y/o demolición). Ella va a revisar las ofertas y horarios, aprobar las facturas con los dueños de las viviendas, pago a las compañías, y mandará las facturas al Estado para su reembolso. Cada situación de mudanza es única y será tratada individualmente con cada inquilino.

Normalmente se toma de siete a diez días para mudar y preparar la casa móvil después de que todos los permisos estén listos. A veces el permiso para habitar la casa toma más tiempo dependiendo del horario de los inspectores (electricidad, amarré, instalación, etc.). Los servicios de "Labor Ready" y "Just Like Daughters" estarán disponibles para los inquilinos con necesidades especiales que desean reducir pertenencias, empacar, mudar, y/o necesitan ayuda buscando una vivienda temporal. Los costos son reembolsables por la Oficina de Viviendas Prefabricadas del Estado de Washington. A los inquilinos también se les proporcionará información de compañías sin fines de lucro que vendrán y recogerán los artículos de no deseados que aún tienen utilidad.

5. Reuniones Iniciales Con Los Inquilinos

El lunes, 19 de mayo, los 66 inquilinos recibieron personalmente notificación de una reunión abierta ("Open House") con la Especialista en Reubicación y su equipo de trabajo, incluyendo intérprete, en las cercanías de "Firs Mobile Home Park". Los inquilinos tuvieron la oportunidad de hacer preguntas sobre el proceso del cierre y aprender sobre la ayuda de reubicación que será ofrecida incluyendo asistencia financiera a los inquilinos de parte de ambos, los dueños de "Firs Mobile Home Park" y la Oficina de Viviendas Prefabricadas del Estado de Washington.

En dicha reunión, los inquilinos tuvieron oportunidad de llenar hojas de información y de hacer una cita individual. Los propietarios de "Firs Mobile Home Park" han asignado una oficina en el lugar para reuniones de reubicación, los horarios e información de la línea directa estarán en la puerta de dicha oficina. Una hoja de inscripción fue proporcionada para obtener información contacto de cada inquilino. La Especialista en Reubicación proporcionó tarjetas de presentación a cada inquilino, con su correo electrónico y línea directa.

En reuniones posteriores, una intérprete estuvo disponible para ayudar a los inquilinos que no hablan inglés. Hay 49 residentes que hablan español y poco inglés. La Especialista en Reubicación y su equipo, incluyendo a Sandra Mears, una trabajadora social con experiencia, se reunieron con individualmente con los inquilinos para completar la forma de reubicación con cada dueño de casa móvil. Varias reuniones se llevaron a cabo en las casas de los inquilinos que no pudieron atender la primera reunión ("Open House"). Varios inquilinos han llamado a la línea directa para hacer preguntas y aclarar información.

El equipo de reubicación pudo completar de manera confidencial las formas con varios de los inquilinos durante esa primera reunión y en reuniones posteriores. Varios inquilinos se llevaron las hojas de información y dijeron que luego llamarían a la línea directa para las mismas fueran recogidas. Casi al finalizar la reunión inicial ("Open House") la mayoría de los residentes del "Firs Mobile Home Park" regresaron para hacer una reunión en grupo y hacer preguntas adicionales. Formas adicionales fueron entregadas en dicha reunión y hubo hojas de registración. Al finalizar la reunión muchos inquilinos influenciaron a sus vecinos para que no llenaran las formas y no firmaran nada hasta que tuvieran la oportunidad de conseguir asistencia legal. Como resultado, no se han entregado más formas y algunos de los inquilinos no firmaron las listas de registración.

Una reunión fue realizada el 11 de junio del 2016 con los inquilinos del "Firs Mobile Home Park" y los representantes de la ciudad de SeaTac para supervisar los procesos de reubicación. Los inquilinos fueron notificados de dicha reunión mediante una carta que el dueño de "Firs Mobile Home Park" publicó en las puertas de cada casa y a través de anuncios colocados en áreas públicas del lugar. La reunión se llevó a cabo en el hotel cercano a "Firs Mobile Home Park". Hubo hojas de registro y muy buena asistencia a esta reunión. La Especialista de Reubicación, un trabajador social y un intérprete en español estuvieron disponibles para responder a preguntas.

Cuando el reporte y plan de la reubicación sea aprobado, se le va a entregar personalmente a cada inquilino del "Firs Mobile Home Park". También va a estar disponible en la oficina de la gerencia y la oficina de reubicación en "Firs Mobile Home Park".

La Especialista en Reubicación tiene una libreta llena de recursos de reubicación que incluye listas de viviendas económicas y/o para personas de bajos recursos, y formas para aplicar a las mismas; terrenos para casas móviles y vehículos recreacionales (RVs) con espacios disponibles; casas móviles a la venta; departamentos disponibles; información para personas con necesidades especiales, tales como: personas mayores, veteranos, y rutas de autobuses. Otros recursos incluyendo compañías de empaque y mudanza, organizaciones sin fines de lucro a las cuales podrán donar artículos, recursos en español, información para cómo aplicar a viviendas, y derechos y responsabilidades de los propietarios e inquilinos. La mayoría de estos recursos fueron provistos en español. En reuniones individuales con varios inquilinos, hemos identificado necesidades especiales de varias personas.

En la reunión inicial ("Open House") y en reuniones individuales, los inquilinos indicaron a qué áreas estarían dispuestos a reubicarse. Varios inquilinos estaban interesados en comprar casas móviles en otros terrenos. Se han hecho llamadas a los diferentes dueños de terrenos para casas móviles de las áreas identificadas y habrá una lista que se proveerá semanalmente a todos los inquilinos indicando los terrenos con lugares disponibles, casas móviles a la venta, y servicios de apoyo disponible. Copias extras también estarán disponibles en una carpeta en la puerta de la Oficina de Reubicación.

6. Fechas para el proceso de cierre

"Firs Mobile Home Park" cerrará en un plazo de 12 meses después de que se emita el aviso oficial. Este aviso tendrá lugar después de que sea aprobado el Reporte y Plan de Reubicación. Los inquilinos pueden llenar documentos con el Estado en cualquier momento después de recibir la notificación del cierre que les da un plazo de 12 meses. Estos documentos tienen que ser entregados antes de la mudanza y someter las facturas de mudanza y/o demolición de la casa móvil. Normalmente el Estado toma unas 2 semanas para revisar las aplicaciones, determinar elegibilidad de cada solicitud para asistencia de reubicación, y enviar cartas de aprobación. Si hacen falta documentos, el Estado también enviará una carta solicitando información adicional. El programa estatal está financiado por impuestos sobre la venta de casas móviles. El estado recibe \$100 por cada venta de casas móviles. Durante la primavera y verano hay un mayor número de ventas de casa móviles por cual entra más dinero a este fondo y a un ritmo más rápido, que en los meses de invierno donde apenas hay ventas. Hay varios terrenos de casas móviles en el Estado que están cerrando, pero actualmente existen los fondos necesarios para proporcionar reembolsos inmediatamente.

7. Horario de asistencia para reubicación:

La Especialista en Reubicación espera trabajar ayudando a los inquilinos con sus reubicaciones entre 10 - 14 horas a la semana. Un buen número de inquilinos trabajan durante el día por lo que las horas de trabajo de la Especialista incluirán tardes y los fines de semana. La Presidenta de Alliance Pacific, Inc., Kerry Lynch, servirá como Especialista en Reubicación. Ella tiene más de 20 años de experiencia trabajando con la reubicación de inquilinos viviendo en terrenos de casas móviles o en complejos de departamentos. Ella ha trabajado muy de cerca con los representantes de varias ciudades y la Oficina de Viviendas Prefabricadas del Estado de Washington en estas reubicaciones.

La señora Lynch cuenta con la asistencia de Sandra Mears, una experta trabajadora social con experiencia previa en reubicación de inquilinos de casa móviles; Kaitlin Larson y Meghan Gaebe, especialistas en viviendas; y por Alma Raymundo, quien ha trabajado como intérprete en 4 diferentes terrenos de casas móviles y un complejo de departamentos. Ella ha estado proveyendo asistencia a inquilinos que no hablan inglés en "Firs Mobile Home Park". Aproximadamente unas 15 a 18 horas al mes se dedicarán a ayudar a los inquilinos a identificar espacios disponibles en otros terrenos de casas móviles, vivienda para personas mayores y/o de bajos recursos y apartamentos económicos y/o para personas con necesidades especiales.

8. Asistencia Adicional para los Inquilinos

Según sea necesario, se proveerán contenedores de basura para que los inquilinos puedan los desechos adicionales creados por la reducción, mudanza, y/o demoliciones. Se coordinará un horario que cause la menor disrupción posible para trabajar en las casas que requieran pruebas y/o disminución de asbestos, y/o demolición. Por razones de seguridad, se le requerirá al contratista de demolición que coloque una cinta delimitando el área demolición. Todas las examinaciones de asbestos, disminución de asbestos y demoliciones las van a realizar contratistas con licencia dentro del Estado y siguiendo las reglas locales.

9. Lista de inquilinos que alquilan terrenos en el "Firs Mobile Home Park" (Apéndice H - Lista de inquilinos que alquilan terrenos en el "Firs Mobile Home Park")

10. Lista de Todas las Partes Involucradas con el Cierre de "Firs Mobile Home Park" (Apéndice I - Lista de Todas las Partes Involucradas con el Cierre de "Firs Mobile Home Park")

11. Especialista en Reubicación

Kerry Lynch, Presidente Alliance Pacific, Inc.
810 W. Lincoln Blvd.
Spokane, WA 99224
(206) 550-8167
klynchapi@comcast.net

La señora Lynch personalmente a coordinado las reubicaciones exitosas de más de 1,800 inquilinos y de inquilinos viviendo en terrenos de casas móviles o en complejos de departamentos que están en el proceso de cierre, recientemente cerraron, o que están siendo renovados en los condados de King, Snohomish, y Spokane, y en las ciudades de Marysville, Seattle, Spokane, Renton, Lynnwood, Des Moines, Shoreline, y SeaTac en Washington.

Sus responsabilidades incluyen servir como la representante de los dueños y coordinar todo lo relacionado a la reubicación incluyendo lo especificado en este Reporte de Reubicación y Plan.

Seguridad Personal de los Inquilinos - La señora Lynch tiene en su poder información confidencial que los inquilinos le han otorgado. Una copia de esta información se mantiene en un archivo con llave en su oficina localizada en 810 W. Lincoln Blvd, Spokane, WA 99224. Dichos documentos serán hechos trizas y destruidos al cabo de 5 años. La forma W-9 de cada residente se le proveerá a los dueños de "Firs Mobile Home Park" para que al finalizar el año, ellos puedan someter la forma 1099 de aquellos inquilinos que solicitaron asistencia por adelantado. Esta información será guardada por los dueños de "Firs Mobile Home Park" en un archivo con llave junto con los contratos de renta y demás documentos de los inquilinos. Todos estos documentos serán hechos trizas y destruidos cuando ya no sean necesarios.

Apéndices

Apéndice A - Listas de espacios disponibles para casas móviles

Apéndice B - Listas de Viviendas

Apéndice C -- Aviso para visitar las viviendas disponibles ("Open Houses")

Apéndice D - Formularios de información de vivienda e ingresos

Apéndice E - Oficina de Viviendas Prefabricadas del Estado de Washington, Información y

Aplicación de Reubicación

Apéndice F - Lista de gastos reembolsable por la Oficina de Viviendas Prefabricadas del Estado de Washington

Apéndice G - Información de la compañía de mudanza y/o demolición

Apéndice H -- Lista de inquilinos alquilando terrenos en "Firs Mobile Home Park"

Apéndice I - Lista de Todas las Partes Involucradas con el Cierre de "Firs Mobile Home Park"

Exhibit B

EXHIBIT B

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

AMENDED APPENDIX/ATTACHMENT I
TO RELOCATION REPORT AND PLAN
FOR THE FIRS MOBILE HOME PARK

Dated: May 29, 2019

The City of SeaTac (the “City”) approved Fife Motel’s Relocation Report and Plan on October 17, 2016 (the “RRP”). On February 5, 2019, Fife Motel (the “Park”) originally submitted an Appendix I to the RRP as required by the King County Superior Court’s Order dated September 19, 2018, in Cause Number 17-2-07094-7 KNT (the “Lawsuit”). The Park and its Tenants have now resolved their disputes by agreeing that the Tenants are required to vacate the Park by June 30, 2020, and that a Relocation Specialist will be made available by the Park from January 1, 2020 until June 30, 2020. The City has agreed that the Park may amend this Appendix 1 to the RRP to so reflect the agreement between the Park and its Tenants.

In summary, the Park will take the below actions from January 1, 2020 until June 30, 2020 to reduce displacement impacts and assist the remaining tenants in the park to relocate based on the information that the tenants provided in their Mobile Home Relocation Information Sheets on November 30, 2018:

- Designation of an experienced Relocation Specialist.
- Individual meetings with each tenant household to identify preferred areas to relocate, school, bus and shopping access.
- Availability of a 24-hour hotline, 206-550-8167 for tenants.
- Identification of tenants with special needs (seniors, disabled, health issues, limited English-speaking).
- Tenants will be provided with assistance including senior housing information, housing locations with nearby health facilities and transportation access.
- A Court-certified translator will be available on-site.
- Identification of mobile home and RV parks and available spaces within 15 miles of the park will be provided twice a month and weekly closer to the park closure date.
- Tenants will have access to an on-site computer to view available housing in the Manager’s Office. Days/Hours of availability will be posted on the office door and near the mailboxes.

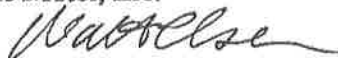
- A phone log will be kept of contacts with mobile home park owners/managers looking for park openings. Assistance with contacting the managers and securing applications and lease information will be provided, as needed.
- Identification of apartments, senior housing, low-income and affordable housing and other housing opportunities within 15 miles of the park will be provided to the tenants on a biweekly basis.
- Assistance with paperwork to secure housing and transportation will be provided, as needed.
- Provision of special tenant assistance which will include up-fronting the cost of demolition of each home.
- Tenants residing in recreational vehicles will be provided their last month's space rent at no cost.
- Publication and distribution to each tenant of monthly tenant information bulletins and newsletters.

Relocation Assistance Schedule:


- The President of Alliance Pacific, Inc., Kerry Lynch, is serving as Relocation Specialist.
 - She has over 20 years of successful experience working with relocating tenants from mobile home parks and apartment complexes.
- The Relocation Specialist expects to spend approximately 10-14 hours a week working with tenants on relocations.
 - A number of tenants in the park work during the day, so hours will also include evenings and weekends.
 - The Relocation Specialist team will be on-site to provide relocation services on Fridays between 2:00-6:00 p.m., and on Saturdays from 10:00 a.m. – 5:00 p.m. If the days and times change, the Park will so notify the tenants. On Fridays, the Relocation Specialist will schedule appointments for a Saturday to meet with residents who request translation services. On Saturdays, a Court-certified translator shall be available to provide translation services to residents.

The parties agree that: (1) this Amended Appendix/Attachment I To Relocation Report And Plan For The Firs Mobile Home Park Dated May 29, 2019 shall replace the previous Appendix/Attachment I To Relocation Report And Plan For The Firs Mobile Home Park; and (2) the Revised Relocation Report And Plan For The Firs Mobile Home Park, as amended by the above Amended Appendix/Attachment I To Relocation Report And Plan For The Firs Mobile Home Park Dated May 29, 2019, shall be the approved Relocation Report and Plan pursuant to SeaTac Municipal Code Section 15.465.600 (H)(3).


Fife Motel, Inc.


By: Walter H. Olsen, Jr., its Attorney
Dated: 1/21/2020

City of SeaTac


By: Mark Johnson, its Attorney
Dated: 01/18/2020

Firs Homeowners Association


By: Vicente Omar Barraza, its Attorney
Dated: 1/17/2020

Crisanto Medina



By: Christina Henry, his Attorney
Dated: 1/21/2020

Exhibit C

EXHIBIT C

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

City of SeaTac

Certificate of Approval

Action: Mobile Home Park Relocation Plan and Appendix

Mobile Home Park: The Firs

Location: 20440 International Blvd.
SeaTac, WA 98198

Property Owner: Fife Motel, Inc.

Address: 706 S. Marine Hills Way
Federal Way, WA 98003

The Relocation Report and Plan for The Firs Mobile Home Park, dated October 7, 2016, in conjunction with the Amended Appendix/Attachment 1 dated May 29, 2019, is found to comply with the requirements of SeaTac Municipal Code 15.465.600.H.3. This approval is valid for a period of two (2) years from the date below.

Date of Issue: January 24, 2020

by:

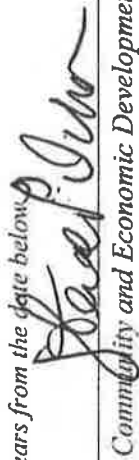

Community and Economic Development Director

Exhibit D

EXHIBIT D

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

BEFORE THE CITY OF SEATAC HEARING EXAMINER

IN RE: APPEAL OF ADMINISTRATIVE
DECISION (FIRS MOBILE HOME PARK
RELOCATION PLAN).

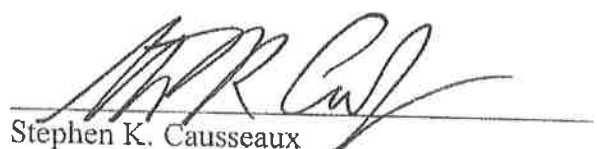
SeaTac File No. APL16-0001

~~PROPOSED~~ *LRC*
DECISION UPHOLDING THE
DIRECTOR'S APPROVAL OF
RELOCATION PLAN AND APPENDIX

After review of Judge Leroy McCullough's "Findings of Fact, Conclusions of Law, and an Order to Remand for Modification Order" dated September 19, 2018 (King County Superior Court Cause No. 17-2-07094-7 KNT), the revised Appendix (dated May 29, 2019 and signed by the Parties in January, 2020), the Certificate of Approval dated January 24, 2020, the letter from the SeaTac's City Attorney's Office dated January 28, 2020, and the record in this case, the following decision is entered:

DECISION: The City of SeaTac Community and Economic Development Director's approval of the Firs Mobile Home Park Relocation Plan and Appendix dated January 24, 2020 is UPHELD.

DATED this 29th day of January, 2020.


Stephen K. Causseaux
City of SeaTac Hearing Examiner

Presented by:

s/ Mark S. Johnsen
Mark S. Johnsen, WSBA #28194
City of SeaTac, Senior Assistant City Attorney

**DECISION UPHOLDING THE DIRECTOR'S
APPROVAL OF RELOCATION PLAN AND APPENDIX**

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188-8605
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

Exhibit E

EXHIBIT E

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

The Honorable LeRoy McCullough
Courtroom 4A, Dept. 32
Hearing Date: Monday, February 1, 2021
Without Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

CRISANTO MEDINA, a married man; and
FIRS HOME OWNERS ASSOCIATION, a
domestic nonprofit corporation,

Petitioners,

v.

CITY OF SEATAC, a Washington municipal
corporation; and FIFE MOTEL INC., a
domestic corporation, *et al.*,

Respondents.

Cause No. 17-2-07094-7 KNT

**[PROPOSED] ORDER FINDING
COMPLIANCE WITH THE COURT'S
SEPTEMBER 19, 2018 ORDER TO
REMAND FOR MODIFICATION**

ORDER

This matter came before the Court on January 21, 2021 on a Joint Motion to Find Compliance with the Court's September 19, 2018 Order to Remand for Modification.

The Court having considered the pleadings filed in this action, including the Stipulation of the Parties Related to Compliance with the Court's September 19, 2018 Order to Remand for Modification, a copy of the Relocation Plan and its Appendix, the City's Certificate of Approval dated January 24, 2020, and the Decision of the Hearing Examiner dated January 29, 2020, the Court finds:

**ORDER FINDING COMPLIANCE WITH THE
COURT'S ORDER TO REMAND FOR
MODIFICATION - 1**

Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
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1. The Parties have complied with this Court's Order dated September 19, 2018.

2. All issues related to this appeal have been resolved, including matters related to the collection of rents and the Mobile Home Park closure date, and therefore this LUPA action has been concluded.

Based upon the above findings, **IT IS SO ORDERED:**

1. The Hearing Examiner's decision upholding the City of SeaTac Community and Economic Development Director's approval of the Firs Mobile Home Park Relocation Plan and Appendix dated January 24, 2020 is **AFFIRMED**.

2. The Relocation Plan and Appendix is referred back to the Parties for implementation and the Court's jurisdiction over the issues in the Land Use Appeal that were raised pursuant to the Land Use Petition Act, Chapter 36.70C RCW, and the appeal concerning those issues has concluded.

DATED and ENTERED this _____ day of January, 2021.

HONORABLE LEROY MCCULLOUGH
Superior Court Judge

Agreed and approved as to form:

/s/ Mark S. Johnsen
Mark S. Johnsen, WSBA #28194
Mary Mirante Bartolo, WSBA #20546
City of SeaTac
Counsel for Respondent, City of SeaTac

/s/ Walter H. Olsen
Walter H. Olsen, WSBA #24462
Olsen Law Firm, PLLC
Counsel for Respondent, Fife Motel, Inc.

**ORDER FINDING COMPLIANCE WITH THE
COURT'S ORDER TO REMAND FOR
MODIFICATION - 2**
Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
Telephone: (206) 973-4640
Facsimile: (206) 838-7223

/s/ Christina Latta Henry

Christina L Henry, WSBA# 31273
Henry & Degraaff, PS
Counsel for Petitioner Crisanto Medina

/s/ Vincente Omar Barraza

Vicente Omar Barraza, WSBA #43589
BARRAZA LAW, PLLC
Counsel for Petitioner Firs Homeowners Association

**ORDER FINDING COMPLIANCE WITH THE
COURT'S ORDER TO REMAND FOR
MODIFICATION - 3**
Crisanto Medina, et al., v. City of SeaTac, et al.
Cause No. 17-2-07094-7 KNT

CITY OF SEATAC, LEGAL DEPARTMENT
4800 South 188th Street | SeaTac, WA 98188
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